

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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JOEL F. HOLUBAR,
&
MARIANA H. HOLUBAR

Plaintiffs,

v.

KENT KHOLBERGER;
THE CHASE FREEDMAN-FAMILY TRUST;
&
M/Y CHEROSA, *in rem*,

Defendants.
-----X

C.A. No.: 03-12404 NG

MOTION FOR ADMISSION OF BJORN J. HOLUBAR PRO HAC VICE

I, Kurt E. Bratten, a member in good standing of the bars of the United States District Court for the District of Massachusetts and the Commonwealth of Massachusetts, hereby move, pursuant to Local Rule 83.5.3(b) of the Local Federal Rules of Civil Procedure, that this Court admit Bjorn J. Holubar, to practice pro hac vice in the above referenced action. Bjorn J. Holubar, Esq. is a member in good standing of the bars of the States of New York and Connecticut and the United States District Courts for the Southern, Eastern, Western and Northern Districts of New York.

In support of this motion, the undersigned states as follows:

1. I will be appearing on behalf of the plaintiffs, Joel F. Holubar and Mariana H. Holubar, in connection with this action.
2. I am actively associated with, and will continue to be actively associated with Bjorn J. Holubar, Esq. throughout the pendency of this action.

3. The Affidavit of Bjorn J. Holubar, Esq. is filed herewith in further support of this Motion.

4. Counsel for the defendants has assented to this motion.

WHEREFORE, Kurt Bratten, counsel for the plaintiffs, Joel F. Holubar and Mariana H. Holubar, respectfully requests that this Court grant this motion to admit Bjorn J. Holubar, Esq. to practice before this Court pro hac vice until this matter is concluded or this Court no longer assumes jurisdiction over the matter.

Respectfully submitted,

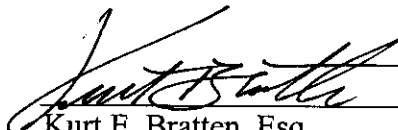
A handwritten signature in black ink, appearing to read "Kurt Bratten", is written over a horizontal line.

Lee T. Gesmer (BBO #190260)
Kurt Bratten (BBO #644730)
Lucash, Gesmer & Updegrove, LLP
40 Broad Street
Boston, Massachusetts 02109
(617) 350-6800

Date: February 24, 2004

Certificate of Service

I hereby certify that on the 27th day of February 2004, copies of the foregoing documents were sent via regular mail to counsel for the defendants, Curtis C. Pfunder, Esq., 92 State Street, Boston, MA 02109.


Kurt E. Bratten, Esq.